



Universal Service Administrative Company  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2014-2015**

July 17, 2015

Inocencio Cruz  
Superintendence of Catholic Schools  
Diocese of Fajardo Humacao  
PO Box 888  
Fajardo, PR 00738

Re: Applicant Name: COLEGIO SAN BENITO  
Billed Entity Number: 159938  
Form 471 Application Number: 942755  
Funding Request Number(s): 2568589, 2643055  
Your Correspondence Dated: June 25, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Notification of Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2568589, 2643055  
Decision on Appeal: **Denied**  
Explanation:

- After further review, USAC determined to rescind the funds committed under the above listed funding request numbers (FRNs) in full. The FCC Form 470# 686570001107248 that established the bidding for these FRNs is encyclopedic. Furthermore, a Request for Proposal was not issued to narrow the scope of the desired services to only those that you actually applied for in these funding requests. FCC rules require that applicants submit "bona fide requests for services" by conducting an internal assessment of the components necessary to use effectively the discounted services ordered and submitting a complete description of services requested so that it may be posted for competing providers to evaluate. During our review, Gilberto Perez was asked why the service descriptions listed on your FCC Form 470 appeared to be "generic" or

"encyclopedic". Specifically, Mr. Perez was asked to explain how he determined the services to request on the FCC Form 470. Mr. Perez responded that the services listed in the FCC Form 470 were obtained from the Schools and Libraries Division (SLD)s Eligible Services List available on USACs website at: <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>. Furthermore, Mr. Perez indicated that he referenced a complete list of eligible services so that schools may select services without limits. Per the FCCs Ysleta Order, an applicant FCC Form 470 must be based upon its carefully thought-out technology plan and must detail specific services sought in a manner that would allow bidders to understand the specific technologies that the applicant is seeking. An FCC Form 470 should not be a general, open-ended solicitation for all services available on the Eligible Services List, with the hope that bidders will present more concrete proposals. Thus, a FCC Form 470 that sets out virtually all elements that are on the Eligible Services List would not allow a bidder to determine what specific services the applicant was seeking. Because Mr. Perez relied on an encyclopedic FCC Form 470, the funding commitment was rescinded in full and USAC will seek recovery of any disbursed funds from the applicant. In your appeal, you did not demonstrate that USAC's decision was incorrect. Consequently, your appeal is denied.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

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Re: Applicant Name: Colegio Santiago Apostol  
Billed Entity Number: 200062  
Form 471 Application Number: 986857  
Funding Request Number(s): 2691858, 2691874  
Your Correspondence Dated: June 25, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Notification of Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2691858, 2691874  
Decision on Appeal: **Denied**  
Explanation:

- After further review, USAC determined to rescind the funds committed under the above listed funding request numbers (FRNs) in full. The FCC Form 470# 686570001107248 that established the bidding for these FRNs is encyclopedic. Furthermore, a Request for Proposal was not issued to narrow the scope of the desired services to only those that you actually applied for in these funding requests. FCC rules require that applicants submit "bona fide requests for services" by conducting an internal assessment of the components necessary to use effectively the discounted services ordered and submitting a complete description of services requested so that it may be posted for competing providers to evaluate. During our review, Gilberto Perez was asked why the service descriptions listed on your FCC Form 470 appeared to be "generic "or



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cc: Daniel R. Rosa Ortiz